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December 7, 2004

Via Telefax 202 736 9080

Anna Mary Coburn, Esq. Office of Children's Issues SA-29, 4th floor U. S. Department of State Washington, D. C. 20520

Re: State/AR-01/96

Proposed Hague Convention Rules — Comment Period

Dear Ms. Coburn:

As you know, I am the legal advisor of the American Adoption Congress.

First, thank you for yesterday's public information meeting. It clarified many points of substance and of procedure.

Second, the American Adoption Congress requests that the comment period be extended by at least thirty days. Yesterday's meeting indicated that those affected by the proposed rules have many questions and comments. Many of those at the meeting had learned only recently about the rules.

The proposed rules are far from simple. Your office apparently has worked on them full-time during the two years since Acton Burnell submitted their last draft. Most of those affected by the rules can only devote part of their time to drafting comments. Under these circumstances, it will not be possible for many of those affected to prepare adequate comments on these complex rules in only two months.

We therefore respectfully request that the comment period on the proposed rules, now scheduled to end on November 14, 2003, be extended by at least thirty days.

Sincerely,

Frederick F. Greenman Jr.

P. S. This letter is also being submitted electronically and in hard copy as a comment on the proposed rules.

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cc: U. S. Department of State (via e-mail adoptionregs@state.gov)

U. S. Department of State, CA/OCS/PRI Adoption Regulations Docket Room SA-29 2201 'C' St., N.W. Washington DC 20520 (2 copies) bcc: Marilyn Waugh

Carolyn Hoard (also via e-mail)

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